

OPERATIONAL PROCEDURE FOR COMPLAINT INVESTIGATION NARRATIVE REPORT WRITING

I. PURPOSE

To provide guidance for the documentation of RCS complaint investigation activities, so that complaint narratives are objective and consistent in appearance, concise in explanation of investigative activities, publicly disclosable, and inform complainants about the resolution of their identified issues.

II. AUTHORITY

[RCW 74.34.067](#) - Abuse of Vulnerable Adults

[RCW 18.20.185](#) - Boarding Homes

[RCW 70.128.070](#) - Adult Family Homes

[RCW 18.51.200](#) - Nursing Homes

III. OPERATIONAL PRINCIPLES

Complaint narratives will provide a brief synopsis of comprehensive complaint investigative activities that RCS has taken in response to an allegation of abuse, neglect, or misappropriation of resident funds.

The narrative report will provide an opportunity to communicate with the public.

A narrative report will be written in a publicly disclosable format for each investigation completed, and will not include information which might identify the resident or the complainant.

The narrative report will be written in a concise factual manner, and will not contain extraneous comments, opinions of the investigator, or paragraphs that rationalize “why” or “why not” a deficiency was identified.

The narrative report will not repeat specific detail information already contained in related statements of deficiency or consultation letters.

The narrative will only describe highlights of a deficiency. The statement of deficiencies (SOD) is the document that will specifically:

- Reflect the content of each requirement that is not met;
- Clearly identify the specific deficient entity practices and the objective evidence concerning these practices;
- Identify the extent of the deficient practice, including systemic practices where appropriate; and,
- Identify the source(s) of the evidence (i.e. interview, observation, or record review).

IV. OPERATIONAL PROCEDURES

A. Investigators

The investigator will:

- Complete a narrative report in a timely manner for each complaint/incident investigated.
- Write narrative reports that meet the operational principles for narrative report writing.
- Write narrative reports that meet the operational procedure format for narrative report writing.

B. Report Format

The investigator will:

- Complete a narrative report for each complaint/incident investigated. The following format must be used for narrative reports:

Heading: A short statement which includes the complaint or incident number, name of facility, name of investigator, and date(s) of the on-site investigation.

Issue: A short statement that briefly paraphrases the issue or allegation.

Findings: A brief description of the investigative facts for each identified complaint issue. Findings must:

- Include a brief description of the investigative methodology i.e. interviews conducted, records reviewed, and direct observations made
- Describe what was found or not found, showing sensitivity, understanding, respect, and concern for the welfare of residents and the feelings of relatives and loved ones
- Respond to the allegation raised by the complainant
- Be stated objectively
- Be written in lay terms, understandable, and stated in past tense
- Exclude speculation or the investigator's personal opinions, feelings, concerns, or personal comments
- Not include miscellaneous extraneous comments

Conclusions: Summary statements for each issue noting if the alleged condition was present, if the alleged incident occurred, whether it reflected a pattern, or if there was a violation of the regulation and what actions were taken to correct the problem by the facility/home.

Action Taken: Refers to the intervention by the investigator and may include reference to the violation or specific deficiency (specify WAC or F-tag), and whether additional action was necessary.